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5 IN THE UNITED STATES DISTRICT COURT
6 FOR THE DISTRICT OF ALASKA

7 CAROLYN MITCHELL,)
8 Plaintiff,)
9 vs.)
10 ANCHORAGE POLICE DEPARTMENT and the)
MUNICIPALITY OF ANCHORAGE, a)
municipal corporation, WALTER MONEGAN,)
Officer HENIKMAN, and Officer J. VOSS,)
11 Defendants.)
12 _____) Case No. 3:05-cv-00273-JWS
13)

14 **STIPULATION TO ADJUST PRE-TRIAL DEADLINES**

15 The parties, through their respective counsel, stipulate and agree to adjust
16 discovery and pre-trial deadlines, with this Court's approval. The requested
17 adjustments have become necessary because the parties have been working on
18 agreeing to a protective order concerning documents Plaintiff has requested during
19 discovery. As a result of the pending discourse concerning these discovery
20 documents, and Defendants' request for a protective order, discovery has not closed
21 in this case. No new discovery is being sought, however requested documents have
22 not been exchanged between parties.
23

24 The parties request that discovery be deemed closed when all documents
25 requested in discovery have been exchanged. Further, the parties request that the
26 deadline for all dispositive motions be set for 30 days after receipt of all discovery
27 documents.
28

1 A proposed Order is submitted herewith.

2 Respectfully submitted this 18th day of January, 2007.

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4 By: s/ Moshe C. Zorea (consent given)
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12

13 Respectfully submitted this 18th day of January, 2007.

14

15 JAMES N. REEVES
16 Municipal Attorney

17

18 By: s/ Joyce Weaver Johnson (consent given)
19 Municipal Attorney's Office
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27 Respectfully submitted this 18th day of January, 2007.

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2 The undersigned hereby certifies that on 1/1/07
3 a true and correct copy of the Joint Motion to Adjust
Pre-Trial Deadlines& Proposed Order was served on:

4 Joyce Weaver Johnson

5 by first class regular mail, if noted above, or by electronic means
6 through the ECF system as indicated on the notice of electronic
filing.

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